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May 27, 2025

**By ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Kane, et al. v. de Blasio, et al.  
1:21-cv-07863-NRB

Dear Judge Buchwald:

I am an Assistant Corporation Counsel in the office of the Muriel Goode-Trufant, Corporation Counsel for the City of New York, attorney for the defendants, Bill de Blasio, David Chokshi, New York City Department of Education, and David C. Banks (“Defendants”), in the above-referenced action.

Defendants write to respectfully request a sixty-day extension of time, from May 28, 2025 to July 19, 2025, for Defendants to serve an Answer to the Amended Complaint. This is Defendants’ first request for an extension of time to serve the Answer, and the requested extension does not affect any scheduled dates. Plaintiffs do not consent to the requested extension, and have given no reason for their refusal to consent to the request.

This extension of time is necessary given the complex history of this matter, as well as the length and prolixity of the 955-paragraph Amended Complaint. Additional time is needed to thoroughly review the docket history and various Court decisions that bear on the allegations in the Amended Complaint, and to appropriately prepare Defendants’ Answer. Therefore, this Office respectfully requests that the Court grant the request for an extension of Defendants’ time to serve the Answer to the Amended Complaint to July 19, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Kathleen M. Linnane  
Kathleen M. Linnane

cc: All Counsel of Record  
(By ECF)